

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Hortense C. Tippett  
Debtor

Chapter 13  
Bankruptcy No. 24-11685-amc

Wilmington Savings Fund Society, FSB, not individually but solely as trustee for Finance of America Structured Securities Acquisition Trust 2019-HB1, or its Successor or Assignee  
Movant

vs.

Kenneth E. West, Trustee  
Hortense C. Tippett  
Respondent(s)

**MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, NOT INDIVIDUALLY  
BUT SOLELY AS TRUSTEE FOR FINANCE OF AMERICA STRUCTURED  
SECURITIES ACQUISITION TRUST 2019-HB1, OR ITS SUCCESSOR OR ASSIGNEE  
FOR RELIEF FROM AUTOMATIC STAY UNDER § 362(a)**

Movant: Wilmington Savings Fund Society, FSB, not individually but solely as trustee for Finance of America Structured Securities Acquisition Trust 2019-HB1, or its Successor or Assignee

Mortgage dated March 25, 2013, and recorded in the Office of the Recorder of Delaware County as Instrument Number: 2013033375 in Mortgage Book 05329 Page 0316.

Assignment of Mortgage dated April 1, 2013, and recorded August 21, 2013 in the Office of the Recorder of Delaware County as Instrument Number: 2013058401 in Mortgage Book 05388 Page 0674.

Assignment of Mortgage dated February 21, 2023, and recorded February 22, 2023 in the Office of the Recorder of Delaware County as Instrument Number: 2023005900 in Mortgage Book 6889 Page 3612.

1. Wilmington Savings Fund Society, FSB, not individually but solely as trustee for Finance of America Structured Securities Acquisition Trust 2019-HB1, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Hortense C. Tippett, or of the bankruptcy estate located at: 346 Congress Avenue, Lansdowne, Pennsylvania 19050.

2. Hortense C. Tippett (hereinafter "Debtor") filed a Petition under Chapter 13 on May 16, 2024.

3. There are no monthly payments required as this is a Reverse Mortgage.

4. The total due as of April 7, 2025, is \$383,072.93.

5. The fair market value of the subject property is \$260,724.00 per filed Schedule D.

6. Under the terms of the Reverse Mortgage, Debtor is responsible for payments of Tax and Insurance. As of April 15, 2025, Movant has advanced a total \$8,733.42, please see breakdown of total due below.

Type	Amount	Date of Payment
Hazard Insurance (11/13/2024-11/13/2025)	\$1,214.36	12/20/2024
School District Tax	\$4,258.65	12/09/2024
Township Tax	\$3,260.41	12/09/2024

7. Since April 7, 2025, Movant has incurred attorneys' fees in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

10. Upon execution and entry of the Order granting the relief requested, the requirements specified in both (1) Fed. R. Bankr. P. 3002.1 (b) regarding Notice of Mortgage Payment Changes and (2) Fed. R. Bankr. P. 3002.1 (c) regarding Notice of Post-petition Mortgage Fees, Expenses and Charges are hereby waived, or made inapplicable, during the pendency of the within bankruptcy case.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code § 362(a) to permit Movant to foreclose its Mortgage and to exercise any other rights it has under the Mortgage or with respect to the mortgaged property such actions may include but are not limited to selling the property at Sheriff Sale, entering into a loan modification or signing a deed in lieu of foreclosure; and

Further, granting Movant permission from this Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with the applicable nonbankruptcy law.

/s/ Marisa Myers Cohen

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